IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

LUCIENA S. GRANT-FLETCHER)
Plaintiff)
VS.) Case No:
COLLECTO, INC. d/b/a EOS CCA)
Defendant)

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that Defendant Collecto, Inc, d/b/a EOC CCA ("Defendant") hereby removes to this Court the state court action described below.

- On September 30, 2013 Plaintiff Luciena S. Grant-Fletcher ("Plaintiff") filed an action in the Circuit Court for Howard County, Maryland, entitled and captioned: *Luciena S. Grant-Fletcher v. Collecto, Inc. d/b/a EOS CCA* (Case No. 13-C-13096493). A copy of the Summons, Complaint, Scheduling Order, Information Report, Jury Demand, and Notice of Service of Discovery Materials that was served on Defendant on October 22, 2013 is attached hereto as Exhibit 1.
- Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. §§
 1692 et seq. and the Maryland Consumer Debt Collection Act, Md. Comm. Code Ann.,
 §§ 14-201, et seq.
- This Court has original jurisdiction over this case under 28 U.S.C. § 1331, and is one
 which may be removed to this Court by Defendant pursuant to 28 U.S.C. § 1441(c) based
 on the Federal law claim.

- 4. This Court has supplemental jurisdiction over the state law claim under 28 U.S.C. § 1367(a).
- 5. Defendant has filed this Notice of Removal within thirty (30) days after service as calculated by Fed.R.Civ.P. 6(a)(1).
- 6. As required by 28 U.S.C. § 1446(d), Defendant will give notice of the filing of this notice to the Plaintiff and to the clerk of the Circuit Court for Howard County, Maryland where the action is currently pending. A copy of the Notice is attached as Exhibit 2.

WHEREFORE, Defendant respectfully requests that the above captioned matter currently pending in the Circuit Court for Howard County, Maryland be removed to this Honorable Court.

THE LAW OFFICES OF RONALD S. CANTER, LLC

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Attorney for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Notice of Removal and related documents was served this 20^{th} day of November, 2013, by first class mail, postage prepaid to:

Thomas J. Minton, Esq. Goldman & Minton, P.C. 1500 Union Avenue, Suite 2300 Baltimore, Maryland 21211 Attorney for Plaintiff

Ronald S. Canter, Esquire Attorney for Defendant